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Reply to  
Nashville Office

November 8, 2005

Chairman Ron Jones  
Attn: Sharla Dillon  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, Tennessee 37243-0505

**RE: Application of Bristol Tennessee Essential Services for a Certificate of Public Convenience and Necessity to Provide Competing Telecommunications Services Within the State of Tennessee, Docket No. 05-00251.**

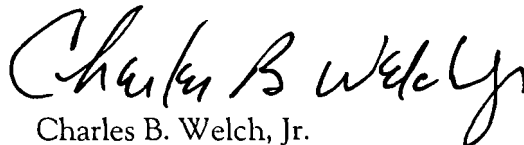
Dear Chairman Jones:

Please find enclosed for filing, an original and 14 copies of Southeastern Competitive Carriers Association Petition to Intervene. Please date stamp one copy for my records.

Thank you for your assistance regarding this matter. If you have any questions, or if I may be of further assistance, please do not hesitate to contact me.

Very truly yours,

**FARRIS MATHEWS BRANAN  
BOBANGO HELLEN & DUNLAP, PLC**

  
Charles B. Welch, Jr.

CBW/jrh



determined by the outcome of this proceeding, and Petitioner's interest or other legal interests or responsibilities will not be adequately represented unless allowed to intervene.

3. Bristol Tennessee Essential Services ("BTES") seeks Authority approval to operate as a competitive local exchange carrier ("CLEC") "throughout the state of Tennessee."<sup>1</sup>

4. BTES seeks a grant of statewide authority so that it may provide services outside of its current existing services footprint.<sup>2</sup> SECCA has a direct interest in how municipal applicants such as BTES will comply with the competitive safeguards set forth under Tenn. Code Ann. § 7-52-401 (2004) *et seq.*

5. SECCA believes its Petition for Intervention is warranted and is being filed more than seven (7) days prior to the hearing of this matter.

6. The Petitioner's participation will not impair the interests of justice or the orderly prompt conduct of the Authority's proceeding.

WHEREFORE, SECCA, respectfully requests that it be granted leave to intervene and participate in this proceeding with all attendant rights and responsibilities, including but not limited to the right to participate in any and all pre-hearing conferences, to produce and cross examine witnesses, to seek data requests and other discovery, and to file motions, briefs, testimony, and/or comments in order to assist the Authority's deliberations and otherwise protect the interests of SECCA and the public interest. Additionally, Petitioner requests to receive copies of any notices, orders or any other

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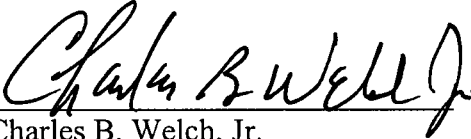
<sup>1</sup> See the Application of Bristol Tennessee Essential Services for a Certificate of Convenience and Necessity to Provide Competing Telecommunications Services, Docket No 05-00251, p 16

<sup>2</sup> *Ibid* at 9

documents filed herein, and have such other, further and general relief as the justice of their cause entitle them to receive.

Respectfully submitted,

**FARRIS, MATHEWS, BRANAN BOBANGO  
HELLEN & DUNLAP, P.L.C.**

By   
Charles B. Welch, Jr.  
Attorney for Southeastern Competitive  
Carriers Association  
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**CERTIFICATE OF SERVICE**

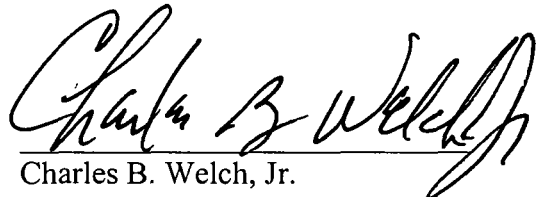
I hereby certify that an exact copy of the foregoing Petition to Intervene has been sent by United States mail, postage pre-paid, to the following parties of record:

Henry Walker, Esq.  
Attorney for BTES  
Boult Cummings, et al.  
1600 Division Street, Suite 700  
Nashville, Tennessee 37203

Guy Hicks, Esq.  
Attorney for BellSouth  
BellSouth Telecommunications, Inc  
333 Commerce Street, Suite 2101  
Nashville, Tennessee 37201

Edward Phillips, Esq  
Attorney for United Telephone-Southeast, Inc.  
14111 Capital Boulevard  
Wake Forest, North Carolina 27587

This the 8<sup>th</sup> day of November, 2005.

  
Charles B. Welch, Jr.